

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Michael L. Lange, and
Nicole L. Lange,
Debtors.

Case No. 22-24487
Chapter 13

OBJECTION TO CHAPTER 13 PLAN

University of Wisconsin Credit Union hereby objects to the Chapter 13 Plan (Doc. 14) and proposed Amended Plan (Doc 26) of the Debtors for the following reasons:

1. The Debtors do not properly value the 2013 Ford F-150. University of Wisconsin Credit Union contends that the value is \$16,440.00.
2. Interest rate on the secured debt should be 7.20%.
3. University of Wisconsin Credit Union objects under Section 1325 (a)(5) in that after confirmation of the plan attorney fees of the Debtors are paid in full prior to any payments being made on the secured debt of University of Wisconsin Credit Union. The plan does not provide for equal monthly payments nor for adequate protection payments after confirmation during the period of time that attorney fees are being paid which is contrary to 11 U.S.C. Sec. 1325(a)(5)(B)(iii)(I and II).
4. The adequate protection payments should be \$200.00 per month.

Dated this 9th day of December, 2022.

s/Michael A. Sosnay

Michael A. Sosnay - State Bar No. 1059549

Attorney for

University of Wisconsin Credit Union

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December, 2022, an Objection to Chapter 13 Plan in this case was electronically filed with the Clerk of Court and served upon the following parties using the ECF system:

Michelle A. Angell, Attorney for Debtor
Rebecca R. Garcia, Trustee
Office of the U.S. Trustee

I further certify that I have mailed by United States Postal Service the same documents to the following non-ECF participants:

Michael L. Lange
W6231 County Road E
Westfield, WI 53964

Nicole L. Lange
W6231 County Road E
Westfield, WI 53964

Dated this 9th day of December, 2022.

s/Laura J. Kolosovsky
Laura J. Kolosovsky
Legal Assistant
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